

FEDERAL PUBLIC DEFENDER
Western District of Washington

October 22, 2015

Via email & mail

Kate Vaughan
Assistant United States Attorney
700 Stewart Street - Suite 5220
Seattle, WA 98101-1271

Re: *United States v. Michaud*; CR15-5351

Dear Ms. Vaughan,

Thank you for your email of October 21, confirming that "Website A" users were able to access child pornography (CP) while the site was under the administrative control of the FBI. Given this information, we request the following additional discovery:

- The number of CP pictures that were posted on the site between February 20 and March 4, 2015;
- The number of CP videos that were posted on the site during that time period;
- The number of links to CP pictures and videos that were posted on the site during that time period;
- The number of CP pictures that were viewed and the number of CP videos that were viewed during that time period.
- The number of CP pictures that were downloaded and the number of CP videos that were downloaded during that time period.
- The number of visitors to the site between February 20 and March 4, 2015, and the number of total visits (recognizing that distinct visitors may have visited the site more than once).
- Some measure of the length of the visits (e.g., total time all visitors were connected to the site; average time visitors were connected to the site).


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- A summary of any measures that were taken by the FBI or other law enforcement entities to block access to the pictures, videos and links available on or through the site between February 20 and March 4, 2015;
- The reason the site was shut down on March 4 (rather than earlier or later); and
- All documents relating to review and authorization of the FBI's administrative control of the site by the Department of Justice or other governmental agencies that were involved in the "Website A" investigation and deployment of the NIT at issue in our case.

I realize that coming up with exact picture, video and link totals may be time consuming, but if you can provide at least a good faith estimate of the numbers at this time, we can request more specific information later if needed.

Thank you for your cooperation.

Sincerely,



Colin Fieman
Assistant Federal Public Defender

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